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Federal Defenders OF NEW YORK,

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Southern District of New York Jennifer L. Brown Attorney-in-Charge

By ECF/Hand

Honorable John F. Keenan United States District Judge Southern District of New York 500 Pearl Street New York, New York 10007

February 19, 2020

United States v. Christopher Torres, 19 Cr. 865 (JFK) Re:

Hon. Judge Keenan:

With the consent of the government, I write to respectfully request a 30-day adjournment of the February 24, 2020 status conference in this case. An adjournment would allow the parties to continue engaging in plea negotiations. This letter constitutes the second request for an adjournment in this case. On January 14, 2020, Mr. Torres requested a 60-day adjournment to continue reviewing discovery and negotiating with the government. The Court granted a 30-day adjournment. I now request that the Court adjourn this conference for another 30 days.

We request that the time between February 24, 2020 and the next court date be excluded under the Speedy Trial Act, pursuant to Title 18, United States Code, section 3161(h)(7)(A). Excluding time will best serve the ends of justice and outweigh the best interests of the public and the defendant in a speedy trial, because it will allow the government and defense counsel to continue discussions regarding a possible disposition in the matter. Thank you.

Respectfully submitted,

/s/ Ariel Werner

Ariel Werner Assistant Federal Defender 212-417-8770

CC: AUSA Rushmi Bhaskaran